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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation

No. 2:15-MD-02641-DGC

**AMENDED CONSENT MOTION  
FOR LEAVE TO FILE UNDER  
SEAL EXHIBITS IN SUPPORT  
OF BARD'S MOTIONS TO**

**EXCLUDE PORTIONS OF DR.  
MUEHRCKE AND DR.  
McMEEKING'S *TINLIN*  
REPORTS AND PLAINTIFFS'  
RESPONSES THERETO**

On December 21, 2018, Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard") filed a Motion to Seal (Dkt. 14017) the exhibits attached in support of Bard's Motions to Exclude the Certain Portions of Dr. Muehrcke and Dr. McMeeking's *Tinlin* Reports served on December 7, 2018. ("the Motions" Dkt. 14015 and 14016). Defendants contend the exhibits to the Motions contain certain trade secrets and confidential information that are protected under the Stipulated Protective Order, warranting protection from public disclosure. Additionally, the exhibits contain confidential medical information about Ms. Tinlin and other MDL plaintiffs that the plaintiffs have sought to seal in prior submissions. In their Responses to the Motions (Dkt. 14656 and 14655), Plaintiffs attached and relied on additional documents that likewise contain information that Defendants contend is protected and that contain confidential medical information, and referred to or quoted such information in their opposition briefs. Plaintiffs lodged those documents, and an unredacted version of their opposition briefs, under seal (Dkt. 14654) The parties have met and conferred and agree that the exhibits to the Motions and Plaintiffs' Responses should be filed and maintained under seal for purposes of consideration of Bard's Motions to Strike. Based on the stipulation and the parties' consent to file these exhibits under seal for purposes of consideration of Bard's Motions to Strike the parties jointly request that the exhibits be sealed, along with Plaintiffs' unredacted opposition briefs.

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1 RESPECTFULLY SUBMITTED this 23rd day of January, 2019.

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**EXHIBIT A****DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**

Defendants request they be permitted to file under seal the following documents:

1. Exhibit A to Dr. Muehrcke motion – Dr. Muehrcke Tinlin Expert Disclosure
2. Exhibit B to Dr. Muehrcke motion – Dr. Muehrcke Reports regarding Booker, Jones, Hyde, Mulkey, and Kruse
3. Exhibit A to Dr. McMeeking motion – Dr. McMeeking’s Tinlin Report
4. Exhibit B to Dr. McMeeking motion – Dr. McMeeking’s Generic Report
5. Exhibit 1 to Response to Dr. McMeeking Motion – Dr. Morris’ Tinlin Report
6. Exhibit 2 to Response to Dr. McMeeking Motion – 06/06/2017 Deposition of Dr. McMeeking excerpts
7. Exhibit 3 to Response to Dr. McMeeking Motion – Dr. McMeeking Coker Report
8. Exhibit 1 to Response to Dr. Muehrcke Motion – Dr. Morris’ Tinlin Report
9. Exhibit 2 to Response to Dr. Muehrcke Motion – 01/11/2019 Deposition of Dr. Muehrcke excerpts
10. Plaintiff’s Opposition to Defendants C.R. Bard Inc. and Bard Peripheral Vascular Inc.’s Motion to Strike Dr. McMeeking’s *Tinlin* Rule 26 Report (Unredacted version)
11. Plaintiff’s Opposition to Defendants C.R. Bard Inc. and Bard Peripheral Vascular Inc.’s Motion to Exclude the Opinions of Dr. Muehrcke (Unredacted version)